

REDACTED Declaration e-mail 07-22-14.txt

From: Whitley, David <david.whitley@texasattorneygeneral.gov>  
Sent: Tuesday, July 22, 2014 3:47 PM  
To: Murphy, Kathleen  
Cc: Clay, Reed; Scott, John; Crawford, John; Randall, Robert  
Subject: RE: Declaration

Kathleen,

Will you give me a call about the declaration when you get a chance?

Thanks,

David

From: Randall, Robert [mailto:Robert.Randall@dps.texas.gov]  
Sent: Tuesday, July 22, 2014 2:55 PM  
To: Whitley, David; Murphy, Kathleen  
Cc: Clay, Reed; Scott, John; Crawford, John  
Subject: RE: Declaration

David,

Below is a listing of the SQL command that was run to create the records extract that DPS delivered to OAG in January.

The qualifier 'dcst\_remove\_dte is null' at the very bottom of the SQL was added in error. As a result, the extract is not complete.

select

```
char(irec_doc_nbr) || '|' || char(dpsp_person_id) || '|' ||  
char(value(dpsp_last_nme,  
  ' '),  
40) || '|' || char(value(dpsp_first_nme,  
  ' '),  
40) || '|' || char(value(dpsp_middle_nme,  
  ' '),  
40) || '|' || char(value(dpsp_suffix,  
  ' '),  
2) || '|' || char(dpsp_dob) || '|' || char(dpsp_ssno) || '|' ||  
char(value(P.dmdt_strt_addr_1,  
  ' '),
```

2:13-cv-193  
09/02/2014

DEF0249

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Crawford  
EXHIBIT NO. 10

Kim Seibert

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```
35) || '|' || char(value(P.dmdt_strt_addr_2,
' '),
35) || '|' || char(value(P.dmdt_city,
' '),
35) || '|' || char(value(P.dmdt_state,
' '),
2) || '|' || substr(P.dmdt_zip_cde,
1,
5) || '|' || substr(P.dmdt_zip_cde,
6,
4) || '|' || char(value(P.dmdt_county,
' '),
3) || '|' || char(value(P.dmdt_country,
' '),
2) || '|' || char(value(M.dmdt_strt_addr_1,
' '),
35) || '|' || char(value(M.dmdt_strt_addr_2,
' '),
35) || '|' || char(value(M.dmdt_city,
' '),
35) || '|' || char(value(M.dmdt_state,
' '),
2) || '|' || substr(M.dmdt_zip_cde,
1,
5) || '|' || substr(M.dmdt_zip_cde,
6,
4) || '|' || char(value(M.dmdt_county,
' '),
3) || '|' || char(value(M.dmdt_country,
' '),
2) || '|' || char(value(dpsp_sex,
```

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```
' '),
1) || '|' || char(value(dpsp_race,
' '),
1) || '|' || char(value(dpsp_disabled_vet,
' '),
1) || '|' || char(value(dpsp_home_bound,
' '),
1) || '|' || char(value(nmbd_first_nme,
' '),
40) || '|' || char(value(nmbd_last_nme,
' '),
40) || '|' || char(value(nmbd_middle_nme,
' '),
40) || '|' || char(value(dlak_d1_nbr,
' '),
25) || '|' || char(value(dcst_status_cde,
' '),
2) || '|' || char(value(dpsp_status,
' '),
1) || '|' || char(value(irec_issuance_typ,
' '),
1) || '|' || char(value(srdc_doc_nbr,
' '),
25) || '|' || char(value(srdc_typ,
' '),
1) || '|' || char(value(irec_issue_stat,
' '),
1) || '|' || char(value(irec_issue_stat,
' '),
1) || '|' || char(value(deth_deceased_cert,
' '),
10)
```

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```
from
  dlnldf.dps_person
join
  dlnldf.issuance_record
    on irec_person_id = dpsc_person_id
left join
  dlnldf.demographic_detail P
    on P.dmdt_person_id = dpsc_person_id
    and P.dmdt_addr_typ = 'P'
left join
  dlnldf.demographic_detail M
    on M.dmdt_person_id = dpsc_person_id
    and M.dmdt_addr_typ = 'M'
left join
  dlnldf.name_dob_aka_info
    on nmdb_person_id = dpsc_person_id
left join
  dlnldf.document_status
    on dcst_id_nbr = irec_id_nbr
left join
  dlnldf.surrendered_doc
    on srdc_person_id = dpsc_person_id
left join
  dlnldf.death_information
    on deth_person_id = dpsc_person_id
left join
  dlnldf.aka_license_nbr
    on dlak_person_id = dpsc_person_id
left join
  dlnldf.conviction_data
    on cnvc_person_id = dpsc_person_id
```

where REDACTED Declaration e-mail 07-22-14.txt  
dpsp\_designation is null  
and dcst\_remove\_dte is null  
WITH UR;

From: Whitley, David [mailto:david.whitley@texasattorneygeneral.gov]  
Sent: Tuesday, July 22, 2014 2:41 PM  
To: Murphy, Kathleen; Randall, Robert  
Cc: Clay, Reed; Scott, John  
Subject: Declaration  
Importance: High

Kathleen,

We need to apprise the Court immediately that we now understand that the extraction that DPS produced to DOJ was inadvertently incomplete. Today, we will file a declaration from DPS that explains the inadvertent incomplete extraction of the DPS database back in January. From what we understand of what happened, the declaration should include the following:

1. The extraction of the DL database that was done on January 15, 2014, was incomplete.
2. It was caused by the accidental misplacement of a qualifier (as we discussed with Bob earlier). The reason for the use of the qualifier in the first place can also be explained here.
3. That the misplacement of the qualifier resulted in the inadvertent exclusion of 2.5-2.8 million records (or whatever the number is in your estimation) from the extraction on January 15.
4. That DPS does not have the capability to re-run or rebuild the January 15 extraction.

G. David Whitley  
Assistant Deputy Attorney General  
Office of the Attorney General

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552.107, and 552.111, and should not be disclosed without the express authorization of the Attorney General of Texas.